

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

INTELLECTUAL VENTURES II LLC, a limited liability corporation,)	Case No. 13 Civ. 3777 (AKH)
)	
Plaintiff,)	DEFENDANTS' MOTION FOR
)	LEAVE TO FILE UNDER SEAL
v.)	
)	ECF Case
JP Morgan Chase & Co. et al,)	
)	
Defendants.)	
)	
)	

PLEASE TAKE NOTICE that pursuant to paragraph 4.B. of the Individual Rules of the Honorable Alvin K. Hellerstein (“Individual Rules”), Defendants J.P. Morgan Chase & Co., JPMorgan Chase Bank, National Association, and Chase Bank USA, National Association (collectively “JPMC”) hereby request leave to file under seal portions of Defendants’ Reply Memorandum of Law in Support of Its Motion to Strike Plaintiff’s Infringement Contentions.

WHEREFORE, JPMC respectfully requests that the Court enter an order authorizing JPMC to file under seal portions of its Reply Memorandum of Law in Support of Its Motion to Strike Plaintiff’s Infringement Contentions, as further described in JPMC’s contemporaneously filed Memorandum of Law in Support of Defendants’ Motion for Leave to File Under Seal.

Dated: November 3, 2014

Respectfully Submitted,

/s/ Brent P. Ray

KIRKLAND & ELLIS LLP

Kenneth R. Adamo
601 Lexington Avenue
New York, NY 10022-4611
Telephone: (212) 446-4839
Facsimile: (212) 446-4900
kenneth.adamo@kirkland.com

Brent P. Ray
300 N. LaSalle Street
Chicago, IL 60654
Telephone: (312) 862-2200
Facsimile: (312) 862-2200
brent.ray@kirkland.com

DURIE TANGRI LLP

Clement S. Roberts
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: (415) 362-6666
Facsimile: (415) 236-6300
croberts@durietangri.com

DONTZIN NAGY & FLEISSIG LLP

Matthew S. Dontzin
Tibor L. Nagy, Jr.
Rachel K. Clapp
980 Madison Avenue
New York, NY 10075
Telephone: (212) 717-2900
Facsimile: (212) 717-8088
mdontzin@dnflp.com
tibor@dnflp.com
rclapp@dnflp.com

Attorneys for Defendants / Counterclaim-Plaintiffs